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20 Attorneys for Plaintiff and the Putative Class

21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 DAPHNE P. RAND, by and through DEBRA
25 J. DOLCH, as Conservator of the Person and
26 Estate of DAPHNE P. RAND, Conservatee,
27 on Behalf of Themselves and All Others
28 Similarly Situated.

Plaintiff,

vs.

AMERICAN NATIONAL INSURANCE
COMPANY, a Texas corporation.

Defendant.

Case No. CV 09 0639 SI

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER MODIFYING THE COURT'S
SCHEDULING ORDER**

Judge Susan Illston

Action Filed: 02/12/09

29 This stipulation is made between Plaintiff DAPHNE P. RAND, by and through DEBRA J.
30 DOLCH, as Conservator of the Person and Estate of DAPHNE P. RAND, Conservatee,
31 ("Plaintiff") and Defendant American National Insurance Company ("ANICO" or "Defendant"),

1 by and through their respective counsel of records, with respect to the following facts:

2 WHEREAS, the Court's Civil Pretrial Minute Order dated November 13, 2009 (Docket
3 No. 78) sets forth the current scheduling order.

4 WHEREAS, the parties stipulated to a one week extension of time for ANICO to respond
5 to the Court's February 9, 2010 Discovery Order concerning contact information for absent class
6 members.

7 WHEREAS, the parties are still conducting discovery and believe that the current
8 scheduling order should be modified to allow for completion of discovery, resolution of any
9 discovery disputes and any other matters;

10 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the
11 parties, through their undersigned counsel, that the parties request a revised schedule as follows:

	Current Date	Proposed Date
Hearing on Motion for Class Certification	June 9, 2010	September 1, 2010
Motion due	May 5, 2010	June 24, 2010
Opposition due	May 19, 2010	August 9, 2010
Reply due	May 26, 2010	August 23, 2010

17 The parties agree to vacate the expert designation and rebuttal expert designation deadlines as well
18 as the expert discovery cut-off. Instead, Plaintiff will designate experts concurrently with the
19 filing of her motion for class certification and Defendant will designate its rebuttal experts
concurrently with the filing of its opposition.

20 DATED: February 19, 2010 BONNETT, FAIRBOURN, FRIEDMAN & BALINT P.C.

21
22 By: /s/Andrew S. Friedman

23 ANDREW S. FRIEDMAN

24 Attorneys for Plaintiff DAPHNE P. RAND, by and
25 through DEBRA J. DOLCH, as Conservator of the
26 Person and Estate of DAPHNE P. RAND, Conservatee

1 DATED: February 19, 2010

WATERS KRAUS & PAUL

2
3 By: /s/Ingrid M. Evans

4 INGRID M. EVANS

5 Attorneys for Plaintiff DAPHNE P. RAND, by and
6 through DEBRA J. DOLCH, as Conservator of the
Person and Estate of DAPHNE P. RAND, Conservatee

7 DATED: February 19, 2010

WILSON ELSER MOSKOWITZ EDELMAN & DICKER

8
9 By: /s/Thomas M. Herilhy with permission

10 THOMAS M. HERILHY

11 Attorneys for Defendant AMERICAN NATIONAL
INSURANCE COMPANY

12 IT IS SO ORDERED.

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14 DATED: _____

15 By  _____

16 The Honorable Susan Illston
17 District Court Judge
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